



Via ECF Filing  
Honorable Jessica G.L. Clarke  
United States District Court  
Southern District Of New York  
500 Pearl Street, Courtroom 20C  
New York, N.Y. 10007-1312

November 27, 2023

Re: Ortega et al. V. Trident Restoration, Inc. et al.  
Case No.: 1:23-cv-01927-JGLC

Dear Judge Jessica G.L. Clarke:

I am in receipt of Plaintiff counsel's letter motion to compel discovery in the above referenced matter. This lawsuit is filled with a myriad of entities, some of which are correctly named defendants, others which are not. It has been an arduous task sifting through the entities and their records. That being said, the Defendants have already provided the payroll records for eight of the twelve Plaintiffs and will be providing all of the interrogatories by the end of the day tomorrow of which there are 22. Additionally, the Defendants are compiling the records for the remaining four Plaintiff's which I am confident will be provided within two weeks from today. I have been in contact with counsel throughout this proceeding concerning discovery.

At no time have the Defendants willfully failed to provide any records nor impede the discovery process. The fact of the matter is that there are just numerous Defendants named in this action and due diligence requires a thorough understanding of the interrelation, if any, between these entities and the employees involved.

The Defendants have never refused to obey an order for disclosure or willfully failed to disclose information. For the foregoing reasons, Plaintiff's motion to compel should be denied. I thank this honorable Court for its review of this reply.

Respectfully submitted,

/s/ Mitchell Segal

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